

CHAITMAN LLP

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Presentment Date: July 3, 2018 12:00 PM
Objection Date: June 26, 2016

*Attorneys for Defendants the Estate of Muriel B.
Cantor, Nancy Atlas, as Personal Representative of
the Estate of Muriel B. Cantor*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC and Bernard L. Madoff,

Plaintiff,

v.

THE ESTATE OF MURIEL B. CANTOR, NANCY
ATLAS, AS PERSONAL REPRESENTATIVE OF
THE ESTATE OF MURIEL B. CANTOR,

Defendants.

Adv. Pro. No. 08-1789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04931 (SMB)

**DECLARATION OF HELEN DAVIS CHAITMAN IN SUPPORT
OF APPLICATION TO WITHDRAW AS COUNSEL**

I, Helen Davis Chaitman, hereby declare, under penalty of perjury pursuant to 28 U.S.C. §1746, as follows:

1. I am a partner with Chaitman LLP, counsel of record to Defendants the Estate of Muriel B. Cantor, Nancy Atlas, as Personal Representative of the Estate of Muriel B. Cantor (the “Defendants”). I submit this declaration in support of an application for an Order pursuant to Rule 2090-1(e) of the Local Bankruptcy Rules of this Court: (1) authorizing Chaitman LLP to withdraw as counsel to the Defendants; and (2) granting such other and further relief as the Court deems just and proper. Unless otherwise stated, the foregoing is based on my personal knowledge.

2. The Trustee commenced this adversary proceeding against the Defendants on December 02, 2010 (the “Adversary Proceeding”).

3. Thereafter, the Defendants retained Becker & Poliakoff LLP to represent them.

4. On behalf of the Defendants, while at Becker & Poliakoff, LLP, I filed a Substitution of Counsel (ECF Doc. No. 40) on July 31, 2015 to represent Defendants.

5. Your Honor signed the Substitution of Counsel So Ordered (ECF Doc. No. 41) on July 31, 2015.

6. On behalf of the Defendants as a partner of Chaitman LLP, I filed a Notice of Appearance and Request for Service of Papers on October 03, 2015 (ECF Doc. No. 45).

7. However, after doing so, Defendant Nancy Atlas on behalf of all Defendants advised me that she was retaining other counsel.

8. To date no substitution of counsel has been filed and Defendants are unresponsive to my inquiries.

9. The Adversary Proceeding will not be disrupted or unduly delayed as a result of this firm's withdrawal as Defendants' counsel.

10. Accordingly, cause exists to grant the application authorizing Chaitman LLP to withdraw as counsel for the Defendants.

Dated: June 12, 2018
New York, New York

/s/ Helen Davis Chaitman